The Municipal Separate Storm Sewer System
(MS4)
NPDES PERMIT

Idaho Transportation Department District 3

Annual Report:
November 2011 – October 2012

Prepared by Idaho Transportation Department,
District 3 Environmental Section
November 2012

Idaho Transportation Department
District Three
NPDES Annual Report
November 2012

This report identifies the activities undertaken by District 3 (District) of the Idaho Transportation Department (ITD) during the current permit year of November 1, 2011 through October 31, 2012, in compliance with the National Pollutant Discharge Elimination System (NPDES) storm water permit issued by the Environmental Protection Agency (EPA), effective on November 29, 2000. This report addresses only updates to information contained in the Annual Reports between the years of 2001 through 2012 and the permit conditions that must be addressed in subsequent permit years that apply exclusively to the District's system. It does not address activities conducted on behalf of the District by another co-permittee, such as Boise City's public education program or the monitoring program conducted by the Ada County Highway District (ACHD). Each permit condition is listed and then followed by a summary of how ITD addressed that condition, in compliance with permit requirement, Part IV, E.1.a. Annual Report.

Structural Controls and Maintenance

Permit Condition A.1.a. *Co-permittees shall adopt design manuals that incorporate Best Management Practices (BMPs) and operation and maintenance criteria for all existing and future structural controls under the jurisdiction of the co-permittees. This requirement may be satisfied by referring to the ITD 2011 Erosion and Sediment Control-Best Management Practices Manual.*

The District is responsible for structural controls that include roadways and associated drainage facilities, bridges, roadsides, and traffic control devices. Drainage facilities include gutters, culverts, ditches, swales, pipes, poly drains, French drains, catch basins/inlets, sand and grease traps, edge drains, transverse drains, and retention/detention ponds. Criteria for the design, operation and maintenance of the structural controls that collect, convey, store, treat, or discharge storm water runoff are contained in the Department's *Design Manual,* 2012 *ITD Standard Specifications for Highway Construction, ITD Maintenance Operations Procedures Manual, ITD Maintenance Manual,* and the *2011 Erosion and Sediment Control-Best Management Practices Manual.* The aforementioned documents have been formally adopted. During the past year ITD has revised portions of the BMP Manual and the Erosion and Sediment Control Manual to include updated drawings and updated BMP applications.

Permit Condition A.1.b. *Operation and Maintenance program. Co-permittees shall develop and implement an operation and maintenance program, to include the following:*

- *Definitive inspection and maintenance schedules for all co-permittee-owned structural controls which include the frequency of routine inspections. Actual inspections shall also be tracked.*
- *Guidelines and criteria for maintenance activities that are to be implemented for co-permittee-owned structural controls, as well as a description of the maintenance activities required such as "disposal of sediment" and "removal of debris."*
- *A description of the inspection, operation, and maintenance of storm water retention facilities owned or operated by co-permittees.*

Permit Condition A.1.c. *Inspection and Maintenance Record Keeping. Each co-permittee that owns or operates structural controls shall maintain an internal record-keeping system to track inspections and maintenance for those portions of the MS4 operated by the co-permittee.*

The ITD *Maintenance Operations Procedures Manual* provides guidelines and policies for maintaining the state highway system and performance standards for ITD maintenance activities. The *2011 Erosion and Sediment Control-Best Management Practices Manual* includes temporary and permanent erosion and sediment controls. Maintenance guidelines are included for these controls. In addition, a Maintenance Storm Water Manual has been developed for District 3 maintenance activities. This document was included in the Year 2 annual report. Structural controls on the state highway system not covered by the agreement with one of the co-permittees are inspected annually by ITD maintenance crews. ITD continues development of a new tracking data base to track inspection and maintenance activities by highway segment for ITD's Storm Drain Inventory. ITD is currently using GIS mapping. When mapping is complete the info will be used to enhance our tracking abilities as well as to provide geographical data.

ITD incorporates storm water management into its in-house inspection certification and training courses. Courses include information on inspections to ensure proper BMP installation, maintenance, and use. In addition, federal and state laws as well as local ordinances are used as guides for ITD maintenance operations.

Floatables

Permit Condition A.2.b. *The co-permittees shall implement a program or programs, such as the Adopt-a-Highway program, to facilitate litter removal from selected highways two times a year or as needed.*

Litter pickup is conducted by ITD maintenance crews and "Adopt-A-Highway" sponsors. The District's maintenance section administers the "Adopt-A-Highway" program, a voluntary litter pickup program. Litter is picked up twice per year as mandated by the "Adopt-a-Highway" work agreement.

Permit Condition A.2.c. *The co-permittees shall ensure that the streets for which they have maintenance authority and responsibility are swept as needed to reduce the discharge of pollutants to the MEP. Co-permittees shall compile a report on the sweeping activity and shall assess the above levels of effort in each of the designated land use type areas with respect to the mitigation of contribution of pollutants from the highways and other public areas that are maintained.*

Sweeping of all ITD roads within the permit area except I-84, is done by ACHD through a cooperative agreement previously attached. Sweeping activity conducted under this agreement is tracked by ACHD. An evaluation of the adequacy of the level of effort on state highways within the permit area has been done by ACHD as part of the overall evaluation of their sweeping activities. Sweeping activity on I-84, by the District, is conducted as needed and within 48 hours of every deicing event when sand and/or salt is used.

Roadways

Permit Condition A.4.a. *Co-permittees shall develop a management practices program. This program shall include those management practices identified during the inventory of co-permittee-owned storm water facilities and audit of site activities undertaken as part of the application for the MS4 Permit. The program shall also evaluate ways to reduce pollutant discharges associated with road maintenance and rehabilitation operation.*

The management practices are currently outlined in the Department's *Design Manual,* 2012 ITD *Standard Specifications for Highway Construction, ITD Maintenance Operations Procedures Manual, ITD Maintenance Manual,* and the *2011 Erosion and Sediment Control-Best Management Practices Manual.*

Permit Condition A.4.b. *Co-permittees shall monitor the application of chemicals and sand applied to roadways for snow and ice control. Co-permittees shall implement programs for proper storage of de-icing materials to prevent materials from entering the storm sewer system, and research alternatives to salt for use in de-icing.*

An anti-icing database is utilized by the District to track the application of magnesium chloride and salt on roads within the District. A review of the individual reports indicates that approximately 395,200 gallons of magnesium chloride/ice slicer were applied by the District in the MS4/NPDES permit area. ITD did store approximately 90 tons of dry salt at the Boise/Orchard maintenance yards, however it was not used within the MS4/NPDES permit area (only stored at these sites). ITD District 3 has ordered 500,000 gallons of magnesium chloride/ice slicer for the year 2012/2013. ITD District 3 has ordered 8000 tons of dry salt for potential use for the year 2012/2013.

Records are kept for maintenance in regards to both sanding and de-icing activities. The magnesium chloride materials used within the NPDES permit area are located within and out of the permit area. Staging and storage areas for magnesium chloride and dry salt within the NPDES permit area have all had modifications to minimize pollutants that could enter into storm drainage facilities. The Boise stockpile is stored under a covered shed to protect materials from weather related precipitation impacts. Storm water that does contact the stockpile is retained and treated on site through a shallow sand swale located adjacent to the stockpile. The Orchard stockpile is contained in a gravel pit and utilizes an evaporation detention pond to detain, capture, and treat materials.

In the future, there is the potential to use the new tracking program to provide a tracking method for ITD sweeping and de-icing activities with respect to specific roadway segments. This would provide an opportunity to express sanding/de-icing activities in both quantitative and qualitative means. Details and processes are still being worked out on how to incorporate this information into the data base and if it can functionally work.

Flood Management Facilities

Permit Condition A.5.a. *Co-permittees shall complete an inventory of all existing structural flood control devices within their jurisdictions to determine the feasibility of retrofitting them to provide additional pollutant removal.*
Permit Condition A.5.b. *Co-permittees shall develop procedures to assure that flood management projects assess the impacts on the water quality of the receiving water.*

The NPDES Permit defines "structural flood control device" to mean a device which has been designed and installed for the purpose of storm drainage during storm events. Within the NPDES permit area, District 3 does not own or operate any facilities that meet this definition.

Illicit Discharges and Improper Disposal

Permit Condition A.7.a. *Co-permittees shall work together to implement a program to inspect and enforce against illicit connections. The program shall include a requirement to update the inventory of all major outfalls within the jurisdictions of the co-permittees.*

Co-permittees shall use the results of existing and on-going dry-weather screening and citizen reports as the primary basis for locating illicit discharges. Co-permittees shall ensure that an appropriate number of personnel receive training in the detection of illicit connections. The program shall include a requirement to update the inventory, within 6 months of the effective date of the permit, of all major outfalls within the jurisdictions of the co-permittees. Co-permittees shall ensure compliance with this program element by inspecting 20% or more of the major outfalls per permit year, totaling 100% of outfalls by the conclusion of the first permit term. If illicit connections are identified or detected, co-permittees shall require their disconnection.

Permit Condition A.7.b. *Each co-permittee shall require the elimination of illicit connections as expeditiously as possible and the immediate cessation of improper disposal practices upon identification of responsible.*

Permit Condition A.7.c. *Co-permittees shall implement complaint investigation procedures to guide staff through recording, investigating and following up on complaints regarding violations reported by the general public.*

The Boise NPDES permit area is contained solely within the ITD's District 3 jurisdiction. The District has 2 major outfalls in the NPDES permit area that are maintained. They are located in the vicinity of Barrister Dr. at Cole and Americana Boulevard at Kathryn Albertson Park. These outfalls receive discharges and connections from multiple jurisdictions. Screening of both major outfalls was completed with some pipes discharging water and others not discharging during dry weather. District roadways within the NPDES permit include I-84; I-184; US/SH 20/26; SH 21; SH 44; and SH 55. Outfall inventory field notes and pictures are included in the attachments as Exhibit A.

The District has entered into a cooperative agreement with the Ada County Highway District (ACHD) for portions of the state highways included in the NPDES permit area, with the exception of the interstate highway, I-84.

Complaint investigation procedures are in place and are described in the Complaint Response Manual, which was included in the Year 2 annual report. The District also coordinates with the co-permittees in receiving and responding to citizen complaints. The District has also entered into cooperative agreements with Boise City and Garden City that gives Boise City and/or Garden City the authority to enforce illegal actions within ITD jurisdiction as requested. A copy of the cooperative agreement with Boise City was included in the Year 2 annual report. A copy of the cooperative agreement with Garden City was included in the Year 3 annual report. Both agreements have been renewed.

No complaints were received this year.

Spill Prevention and Response

Permit Condition A.8.a. *Co-permittees shall participate in an interagency spill response task group to ensure that a coordinated response to spills is achieved and that impacts upon aquatic resources from spilled pollutants are controlled to the MEP.*

ITD has in place an Emergency Response Program and a Hazardous Materials/Hazardous Waste Program to deal with the prevention, response, and containment of any spills that occur on ITD right-of-way. During the last year ITD had no incidents concerning the need to contain any spills. Several other agencies also participate in the State Response System. Spill records are kept by the Idaho State Police. In Ada County, Ada County Emergency Management coordinates these activities and the District has participated in their meetings. A copy of the relevant portions of the *Idaho Transportation Department Maintenance Manual* pertaining to Hazardous Material/ Incidents or Spills and a copy of *The Idaho Hazardous Materials Response Plan* was included in the Year 2 annual report.

Construction Site Runoff

Permit Condition A.10.a. *Co-permittees shall implement a Construction Site Discharge Control Program 18 months from the effective date of the permit. The program shall contain elements to control the contribution of pollutants from the construction site activity to the MEP.*

Permit Condition A.10.b. *Co-permittees shall conduct inspection of construction sites to ensure compliance with the measures outlined in II.A.10(a).*

Permit Condition A.10.c. *Co-permittees shall develop and maintain a database of all active and completed construction sites permitted within their jurisdiction and completed during the term of this permit.*

Language addressing storm water control and Clean Water Act compliance is included in ITD construction project contracts. Specific information concerning contractor responsibility for the containment and management of storm water is included in the Special Provisions section of the construction contract.

The Department's *Design Manual, ITD Standard Specifications for Highway Construction*, the *Contract Administration Manual,* and the *2008 Erosion and Sediment Control-Best Management Practices Manual* contain sections devoted to erosion and pollution control measures for application on active construction sites. These BMPs help to minimize the erosion and sedimentation generated during the construction phase of a project. All of these documents have been formally adopted.

ITD staff receives training in the application, design, installation and maintenance of BMPs to the extent necessitated by their respective responsibilities. ITD has implemented a two day SWPPP development training class for designers.

ITD maintains and updates the ITD Storm Water Pollution Prevention Plan (SWPPP) Template to account for any internal changes. The SWPPP Template was last updated in June of 2012. ITD uses a template format that follows a similar model to that of the EPA. This template is intended to help operators by incorporating ITD policies, NPDES Construction General Permit Requirements, and other local, state, and federal rules and regulations into a comprehensive template that functions to help in achieving compliance.

The Storm Water Pollution Prevention Plan (SWPPP) Template example can be accessed through the following link: http://itd.idaho.gov/enviro/Stormwater/Design/default.htm. During the current year, ITD updated and modified the ITD-2802 Storm Water Compliance Inspection form to reflect the changes in the new 2012 CGP. The newly revised form is provided in the attachment section.

Public Education

Permit Condition A.11.a. *The co-permittees shall implement a program to inform the public of the impact of pollutants in storm water on waters of the United States and how to avoid adding such pollutants to storm water runoff.*

Educational materials and other outreach events relevant to the NPDES permit are cosponsored by ITD D3 and provided by Boise City.

The District makes available at all project preconstruction conferences an educational brochure titled, "Storm Water Pollution Prevention Plan Questions & Answers That Relate to Ensuring Compliance." This brochure provides answers and information to Operators on some of the most commonly asked questions relating to Storm Water Pollution Prevention Plan requirements and compliance. A copy of the brochure was provided in the 2007-2008 annual report for reference. ITD now provides employees with a quarterly news letter devoted to storm water education, the news letter is also available on the ITD environmental web site.

ITD Environmental has developed and maintains an online web site that contains information and links to NPDES/CGP/Stormwater information. This site and corresponding information can be accessed through the following link: http://itd.idaho.gov/enviro/Stormwater/default.htm

Public Education is also covered in the Boise City report.

Legal Authority

Permit Condition C. Legal Authority. *Co-permittees shall include with the first annual report a demonstration that each co-permittee possesses legal authority that satisfies the six criteria listed. Co-permittees shall include with this demonstration; copies of all statues, ordinances, permits, contracts, orders or inter-jurisdictional agreements that they contend demonstrate the adequacy of their legal authority.*

The Idaho Transportation Department (ITD) is an executive branch agency of the State of Idaho. ITD's duties include but are not limited to proper planning, construction, maintenance, operation and protection of the state highway system. As an executive branch state agency, ITD has very broad rule making authority. Additionally, ITD has broad intergovernmental contracting authority.

The powers and authorities of ITD are contained in the Idaho Code, Title 40, Chapter 3 (Idaho Transportation Board), Chapter 4 (Idaho Turnpike Authority), Chapter 5 (Idaho Transportation Department), and Chapter 6 (County Commissioners and Highway Officers). Copies can be found in Appendix A of the Part 2 NPDES Municipal Storm Water Permit Application, submitted by the co-permittees.

The Idaho Transportation Board is vested with authority, control, supervision and administration of the Department. Pursuant to Section 40-310 (3), the Board shall "locate, design, construct, reconstruct, alter, extend, repair and maintain state highways, and plan, design and develop statewide transportation systems".

The District controls third-party activities on District rights-of-way through the conditions associated with encroachment permits. IDAPA 39.03.42, "Rules Governing Highway Right-of-Way Encroachments on State Rights-of-Way," provides ITD with access control through a permitting process. The rule defines an encroachment as "any authorized or unauthorized use of highway right-of-way or easements or air space immediately above the highway right-of-way." (IDAPA 39.03.42, 010.30). Encroachment permit conditions require compliance with Federal and State of Idaho standard plans and specifications. Encroachment permits are also conditioned to require environmental compliance, including implementation of applicable BMPs comparable to those required of ITD.

The rule contains specific provisions controlling drainage and storm water. When border area work is permitted, the rule requires "that adequate sight distance, proper drainage, desirable slopes for maintenance operations, and a pleasing appearance are provided." (IDAPA 39.03.42, 400.12). The rule provides ITD with additional drainage control through the requirement that "All approaches shall be graded so that private properties abutting the highway right-of-way do not drain onto the traveled way, do not impair the drainage within the right-of way, alter the stability of the roadway subgrade or materially alter the drainage of areas adjacent to the right-of-way. Post-development drainage flows shall not exceed predevelopment drainage flows." (IDAPA 39.03.42, 400.13.a.). ITD's addition of a Development Services Section provides a formal opportunity to review and provide comments from ITD to land use agencies and developers with input from the Environmental Section.

An approved right-of-way encroachment permit is required for irrigation or drainage within state highway right-of-way (IDAPA 39.03.42,600.01) and Best Management Practices (BMPs) are required to temporarily control for erosion and sediment (IDAPA 39.03.42, 600.04).

Unauthorized and nonstandard encroachments are prohibited and they may be removed or their use may be suspended (IDAPA 39.03.42, 800.02). It is this provision that gives ITD the authority to control illicit discharges and illegal connections to their MS4.

The District coordinates with other permittees on storm water management responsibilities, especially when discharges from one permittees system flow to storm water systems owned and operated by another permittee. Coordination is implemented through formal and informal discussions, meetings, agreements and procedures. This coordination includes attending meetings, participating in special studies, identifying storm water run-on issues, reporting spills, etc.

The legal authority criteria and their applicability to ITD are as follows:

1. *Control through ordinance, permit, contract, order or similar means, the contribution of pollutants to the MS4 by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity.* The Boise City Storm Water Management Ordinance and the Ada County Highway District Developmental Policy Manual addresses industrial activities. Authorities contained in IDAPA 39.03.42 can also be used to address unpermitted discharges to the ITD system from an industrial activity.
2. *Prohibit through ordinance, order or similar means, illicit discharges to the MS4.* The Boise City Storm Water Management Ordinance and the intergovernmental agreement between the co-permittees address this criterion. Additionally, illicit discharges to the ITD system can be addressed by authorities contained in IDAPA 39.03.42.
3. *Control through ordinance, order, or similar means the discharge to the MS4 of spills, dumping or disposal of materials other than storm water. The Boise City Storm Water Management Ordinance and the intergovernmental agreement between the co-permittees address this criterion. Additionally, unpermitted discharges to the ITD system can be addressed by authorities contained in IDAPA 39.03.42 and through agreements with Boise City and Garden City that gives them the authority to enforce illegal actions in ITD jurisdiction as requested by ITD.*

   The existing intergovernmental agreement between the agencies has been extended and will expire at the time the new MS4 permit is issued. At that time the co-permittees will assess the agreement as required to examine if any changes are needed. A copy of the extension is attached.

4. *Control through interagency agreements among co-permittees the contribution of pollutants from one portion of the MS4 to another portion of the MS4.* The intergovernmental agreement between the co-permittees addresses this criterion.
5. *Require compliance with conditions in ordinances, permits, contracts or orders.* This authority is contained in sections of Idaho Code, cited above.
6. *Carry out all inspection; surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the MS4.* This authority is contained in sections of Idaho Code, cited above, and authorities contained in IDAPA 39.03.42.

Budget

The District pays for the program cost share out of General Operating Expenses. ITD has paid approximately $16,925.00 towards their share of program costs for 2011/2012 and have budgeted approximately $27,000 for their share of the program costs for 2012/2013. ITD District 3 also now has a Senior Planner who is working on GIS mapping of storm water facilities. The Planner is also working on developing a storm water data base. This position has spent 544 hours to date working on the previously mentioned tasks. The approximate cost for ITD employee's time spent for the MS4 permit is $21,000.00.

Annual Report Certification

Idaho Transportation Department NPDES Municipal Separate Storm Sewer System Annual Report FOR Permit Year 2011-2012

Boise City and Garden City, Idaho Area
NPDES Stormwater MS4 Permit

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

David B Kusti Engineering Manager — 12-5-12

Name/Title — **Date**

for Dave Jones, District Engineer
Idaho Department of Transportation

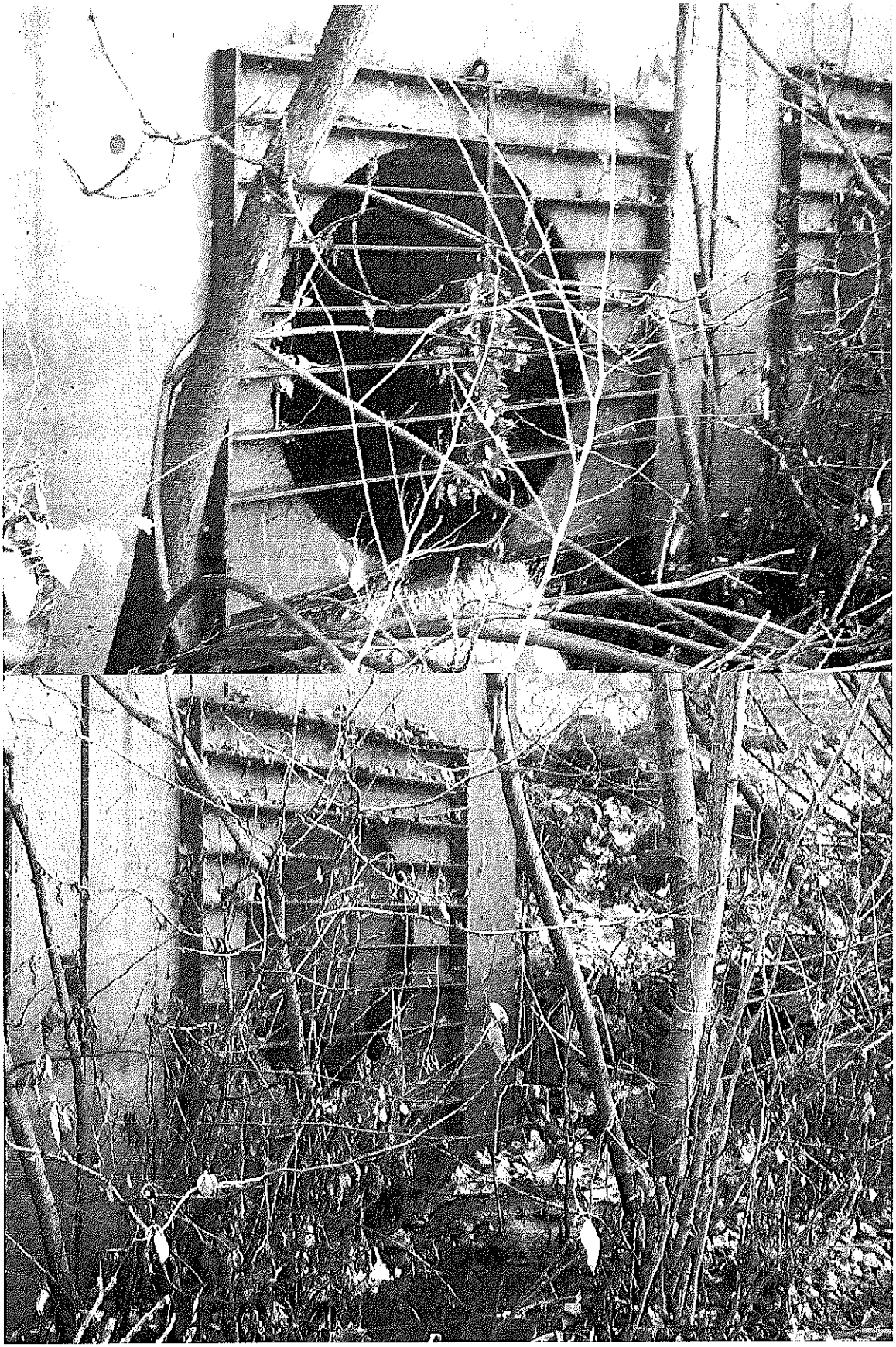
List of Attached Documents

Appendix A: Dry Weather Screening of Outfalls

Exhibit A:

NPDES MS4, 2011-2012 OUTFALL OBSERVATION FIELD NOTES

October 17, 2012
Weather Conditions--- Cool – 45-60



River Street Drain (north side Americana Bridge):
- 2 Outlets in Area, Covered by Trash Racks
- 48" West Outlet Discharging Water
-No sheens from discharge coming from pipe.
-Water was clear in color and free from odor.
-Grate has some debris/floatables and was cleaned after taking the picture
- 42" East Outlet Observed Dry
- Grate had small amount of debris/floatables and was cleaned after taking the picture

Cole and Franklin Roads (north side of Barrister Road into Ridenbaugh Canal):
- 2 Outlets in Area
- 12" East Outlet (Private Outlet)---No discharge.
- 36" West Outlet ---Minimal/No discharge.

Stormwater Compliance Inspection

ITD 2802 (Rev. 11-28-12)
itd.idaho.gov

Inspection Identification Number* - -

*Identification Number is created automatically once District Number, Key Number, and Inspection Number have been entered.

Section 1 - Project Information

Key Number	Project Number	Project Name	
ITD District	Resident Engineer		ITD NPDES Tracking No. IDR12
Prime Contractor's Name	Contractor's NPDES Tracking No. IDR12	Contractor Has Filed Their NOT ☐ Yes ☐ No	If Yes, Date NOT Filed

Section 2 - Inspector Information

Inspected By	ITD Inspector Qualification Program Number (IQP)
Inspector(s) Designation ☐ Joint ITD and WPCM ☐ ITD Environmental ☐ Contractor's WPCM ☐ Other/3rd Party	

Section 3 – Inspection and Weather Information

Inspection No.	Current Inspection Date	Previous Inspection Date	Number of Days Since Last Inspection
Reason for Inspection ☐ Routine ☐ Rain Event	Explanation (if required)		
Current Weather Conditions and Temperature	Describe each measureable precipitation event since the last inspection		

Section 4 – Construction and Stabilization/SWPPP Recordkeeping Status

Estimate the construction site and construction support activity area currently disturbed and unstabilized.	Acres
Estimate the construction site and construction support activity area currently temporarily stabilized with erosion controls.	Acres
Estimate the construction site and construction support activity area currently permanently stabilized with erosion controls, or that has yet to be disturbed by construction activities and is therefore stabilized.	Acres
Provide the total acreage of disturbance expected, or the total project footprint. The previous 3 boxes should add up to this amount, and it should match what is shown on the project plans, SWPPP narrative, and NOI.	Acres
The SWPPP reflects the most current project conditions including grading, stabilization, and BMP installation.	☐ Yes ☐ No
Provide the date of the most recent SWPPP update or modification.	
Comments	

Section 5 – Construction Areas, Discharge Points, and Installed Controls (BMPs) Inspected

For any areas not inspected, include the reason in the Observations section.

Construction Areas

Area	Station No. or Location Description	Observations
Areas Cleared, Graded, or Excavated		
Onsite Waste / Borrow / Stockpiles		
Offsite Waste / Borrow / Stockpiles		
Equipment Storage/Maintenance/Fueling		
Contractor Yards / Material Storage		

Area	Station No. or Location Description	Observations
Site Entrances and Exits/Offsite Tracking		

Discharge Points – Includes stormwater, non-stormwater, and other potential pollutant sources

Note all discharge points in this table. Document any controls required to address them in the Installed Controls (BMPs) table below.

Type of Discharge Point	Station No. or Location Description	Observations

Discharges Entering Waters of the US

If a discharge violated ID water quality standards (5.2.1.2), or is a prohibited discharge (5.2.1.3), it must be reported to HQ ENV SWPPP using Form ITD 2790 within 24 hours, and documented in the project's Corrective Action Reporting Log as required by 5.4.

If a discharge is occurring or has occurred, describe the discharge location (s) and visual observation/description/quality (4.1.6.6.b)
Identify if controls have operated effectively or are in need of maintenance, or if additional controls are needed (4.1.6.6.c)

Installed Controls (BMPs)

In this table note all installed controls used to divert/convey/retain/treat stormwater and/or non-stormwater, erosion and sediment controls, temporary or permanent stabilization measures, and pollution prevention measures

Type/Description of Control	Station No. or Location Description	Observations

Section 6 – Maintenance Requirements, BMP Installations (per SWPPP), and Corrective Actions

Completed Since Last Inspection

Item No.	Location	Action Taken	Date Completed
1			
2			

Identified During Current Inspection

Item No.	Location	Action Required	Date to be Completed
1			
2			

Identify any and all actual or potential incidents of CGP noncompliance, including administrative noncompliance

Conditions Triggering Corrective Action Report

If any of the 3 conditions below are checked, an entry must be made into the Corrective Actions Reporting Tables in the SWPPP per CGP 5.4.

- ☐ Required stormwater control was never installed, was installed incorrectly, or not in accordance with the requirements in CGP Parts 2 and/or 3 (5.2.1.1) (Additional BMPs not identified in initial SWPPP)
- ☐ The stormwater controls installed are not effective enough for the discharge to meet applicable water quality standards or applicable requirements in CGP Part 3.1 (5.2.1.2.) (Turbid discharge)
- ☐ One of the prohibited discharges in CGP Part 2.3.1 is occurring or has occurred (5.2.1.3) (Toxic or hazardous material)

Summary of Inspection Findings - Check all that apply

- ☐ No Maintenance Requirements were noted in the previous inspection report.
- ☐ All Maintenance Requirements noted in the previous inspection report **have been** satisfactorily completed.
- ☐ All Maintenance Requirements noted in the previous inspection report **have not been** satisfactorily completed.
- ☐ New Maintenance Requirements have been identified in the current inspection report.

☐ BMP Installation Requirements per SWPPP have been identified in the current inspection report.

☐ Conditions exist that triggered an entry into the Corrective Actions Reporting Log in the SWPPP per CGP 5.4.

☐ Conditions exist that triggered the need to submit an ITD 2790.

Section 7 - Other Outstanding Items or Notes

Document Outstanding Issues or Other Project Information **Not** Designated as a Corrective Action or Maintenance Requirement
List any Permits/Special Operating Conditions for the Project

Section 8 - Inspection Certification

Key Number	Inspection Number	Current Inspection Date

Primary Inspector's Name (Type or Print)	
Primary Inspector's Signature	Date Signed

Water Pollution Control Manager (WPCM) Signature

WPCM Name (Type or Print)	WPCM Training Qualification Date	WPCM Training Qualification Number
WPCM Signature		Date Signed

Contractors Acknowledgment – Receipt of Inspection and Acknowledgment of Inspection Findings

I have received a copy of this inspection report and been informed of Maintenance Requirements and/or Corrective Actions, and:

☐ I agree with the inspection findings

☐ I disagree with the inspection findings (specify reasons below)

If contractor disagrees with findings and recommended Maintenance Requirements and/or Corrective Actions, specify reasons in the space below

Must be signed by Prime Contractor or Duly Authorized Representative

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Prime Contractor or Duly Authorized Representative's Name (Type or Print)	Title
Prime Contractor or Duly Authorized Representative's Signature	Date Signed

Section 9 – ITD Compliance Certification - Must be signed by District Engineer or Duly Authorized Representative

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

District Engineer or Authorized Representative's Name (Type or Print)	Title
District Engineer or Authorized Representative's Signature	Date Signed

Distribution: Original – DE Copies – RE DEM. Dist. Env. HQ ENV SWPP Contractor

ITD 2802 Instructions and Inspection Procedures

General Information

The inspection and documentation procedures must follow 2012 Construction General Permit (CGP) requirements.

A copy of the National Pollution Discharge Elimination System (NPDES) CGP and a copy of the current Stormwater Pollution Prevention Plan (SWPPP) must be available on the project site, or at an easily accessible location at all times per CGP section 7.3.

On all ITD projects with coverage under the CGP, the Prime Contractor must designate a Water Pollution Control Manager (WPCM) as specified in and required by ITD Contract. The WPCM performs stormwater compliance inspections on behalf of the Contractor, resolves compliance issues, and communicates regularly with ITD as part of the CGP required Stormwater Team and as required by the Engineer.

If there are any questions pertaining to the project SWPPP, contact the Senior Environmental Planner in the District.

If there are any questions regarding contract administration, contact Headquarters Construction.

If there are any questions regarding documentation and recordkeeping requirements, reporting of permit noncompliance or discharge events, contact the Stormwater Compliance Coordinator in the Headquarters Environmental Section.

Section 1 – Project Information

- Provide the EPA assigned unique NPDES permit tracking number for ITD and the Prime Contractor.
- Indicate whether the Prime Contractor has filed their Notice of Termination (NOT) of permit coverage, and if so, the date filed. If the Contractor has filed their NOT, the WPCM and Contractor are no longer required to sign the inspection forms.

Section 2 – Inspector Information

- Each project must be inspected by an ITD qualified Environmental Inspector and/or Prime Contractor designated, ITD qualified WPCM. Include the Inspector name and ITD Inspector Qualification Program (IQP) number. Enter WPCM qualification information into ITD 2802, Section 8 if applicable.
- Check the box that represents the Inspector's Designation, i.e., who participated in completion of the inspection. More than one box may be checked. Checking the first box represents a joint inspection by the ITD inspector and the WPCM.

Section 3 – Inspection and Weather Information

- The number of days since the last inspection is determined by counting the number of days beginning the day after the last inspection took place. For example, if an inspection was done on June 1st, the next 7-day inspection would be due on June 8th and the next 14-day inspection would be due on June 15th.
- Inspection frequency can change throughout the life of a project as long as a SWPPP modification is completed to document the change. Your SWPPP should always reflect the current frequency. Indicate whether a routine inspection is being performed or if it is a rain event inspection by checking the appropriate box. If needed, provide an explanation for any special circumstances or special inspection frequency in the space provided.
- Inspections are required during the project's normal working hours during Work Days as defined in CGP Appendix A, and should be documented in the SWPPP. Significant changes to the normal work day schedule should be documented in the SWPPP as a modification as needed. Outside of normal working hours on Work Days, WPCM inspections are required as specified by the Contract and/or by the Engineer.
- Provide a description of the weather conditions at the time of inspection, including the current temperature and cloud cover.
- If performing rain event inspections, each project must be inspected within 24 hours of a storm event producing 0.25 inches or greater. If the storm event is multiple days, and each day produces 0.25 inches or greater, another inspection must be completed within 24 hours after the end of the storm event. See CGP sections 4.1.2.2, 4.1.3.2, and 4.1.4.2 for additional rain event inspection information.
- For any day of rainfall during normal working hours that measures 0.25 inches or greater, you must record the total rainfall measured for that day in accordance with CGP section 4.1.7.1.d. Provide a description of each measureable precipitation event since the last inspection. Provide the date(s) and approximate amount of measureable precipitation recorded on the project.

- To determine storm events at your project, you must either keep a rain gage at the project in order to obtain site-specific rainfall information, or obtain the storm event information from a weather station that is representative of your project.

Section 4 – Construction and Stabilization/SWPPP Recordkeeping Status

- No clearing or grubbing is allowed outside the physical clearance limits shown on the site plans of any project. No clearing or grubbing shall take place outside the schedule in the project SWPPP.
- Estimate to the nearest ¼ acre the amount of land **currently** disturbed by construction and not stabilized with erosion controls. This is not the total project area, just what is currently disturbed. All areas disturbed including staging areas, stockpile areas, waste sites, and source areas must be included in the disturbed area calculation, unless the source areas are covered by a separate Multi Sector General Permit (MSGP). ITD specification 212.03 includes additional requirements for disturbed acreage limitations and installation of erosion and sediment controls.
- Estimate to the nearest ¼ acre the amount of land that has been temporarily stabilized with erosion controls. This does not include sediment controls such as perimeter protection. Only include erosion controls such as tackifier, mulch, plastic, blankets, etc.
- Estimate to the nearest ¼ acre the amount of land that has been permanently stabilized with erosion controls.
- Provide to the nearest ¼ acre the total disturbed acreage expected on the project. All three of the previous boxes (currently disturbed, temporarily stabilized, permanently stabilized) should add up to the total project area disturbance.
- Confirm that the project SWPPP reflects the most current project conditions, and provide the date of the most recent SWPPP update or modification. This includes routine SWPPP updates, recordkeeping, and/or formal SWPPP modifications.
- Provide any additional information or comments pertaining to the area of disturbance, stabilization, SWPPP status, etc. as needed.

Section 5 – Construction Areas, Discharge Points, and Installed Controls (BMPs) Inspected

General Procedures/Requirements:

- Include an explanation for any areas not inspected in ITD 2802, Section 5 in the Observations columns of the tables.
- Inspectors must look for evidence of or the potential for stormwater, non-stormwater, and pollutants discharging from and leaving the project limits, and/or entering the stormwater conveyance system or Water's of the U.S.
- Inspections need to include all construction areas and construction support areas, on-site and off-site, disturbed by construction activity, including waste sites, stockpiles, storage sites, and borrow areas, etc.
- Identify locations examined using descriptions like station numbers, mileposts, or other location designations.
- ITD 2802, Section 5 is not locked so that entries can be added or deleted to each table. To add a row to the end of a table, tab to the last cell of the last row and hit the tab button. To add a row to the middle of the table, place the cursor into the row you want to add to above or below, and right click your mouse. Click on Insert, and then Insert Above or Insert Below.
- To Delete an existing row, place the cursor into the row you want to delete, and right click your mouse. Click on Delete Cells, and then click Delete Entire Row.

Construction Areas:

- Fill out the table concerning Areas Cleared or Graded, Onsite and Offsite Waste/Borrow/Stockpile areas, Equipment Storage/Maintenance/Fueling Areas, Contractor Yards and Material Storage Areas, and Site Entrances/Exits.
- Erosion, sedimentation, and pollution prevention control measures identified in the SWPPP need to be observed in order to ensure proper installation and operation at these locations.
- Inspect locations where vehicles enter or exit the site for evidence of off-site sediment tracking. Track-out must be removed by the end of the same work day in which it occurred. See CGP section 2.1.2.3 for more information.

Discharge Points:

- Fill out the table listing all Discharge Points, or areas where the potential for discharges from the project exist. Some examples of these include median drain, cross drain, box culvert, drop inlet, perimeter control along a surface water, bridge abutment, etc.
- Discharge locations need to be inspected to ascertain whether erosion and sediment control measures are operating effectively and are adequate to ensure water quality standards are being met.

- If a discharge location is identified during an inspection that is not listed in the current SWPPP, and additional BMPs are required to address the new location, the SWPPP needs to be modified to include this location and required controls. Additionally, Corrective Action reporting may be required. See ITD 2802, Section 6 below for additional information.
- Identify if discharges are occurring or have occurred, and whether they have entered Waters of the U.S. If this has occurred, describe the discharge and whether the BMPs have operated effectively enough to meet water quality standards.
- If discharges have exceeded 50 NTU above background of the receiving water, or a prohibited discharge occurred per CGP Part 2.3.1, additional reporting requirements exist. Use form ITD 2790 and follow the instructions associated with that form. Also complete Corrective Action reporting requirements as described below in ITD 2802, Section 6.

Installed Controls (BMPs):

- Fill out the table listing all BMPs installed at the time of inspection. Add controls to the table as they are installed during construction build-out and phasing. On smaller projects you can list each individual control by its specific location. On larger more expansive projects with significant controls you can group the type of control together but list the multiple locations where it is installed.
- Some examples of these include perimeter controls such as fiber rolls or silt fence; erosion controls such as tackifier, mulch, or blankets; sediment controls such as rock check dams or inlet protection; sediment basins; or pollution prevention controls such as concrete washouts, dumpsters, portable toilets, etc.
- As controls are removed from the project, either delete them from the table, or simply note "removed on date X" in the Observations column for that control.

Section 6 – Maintenance Requirements, BMP Installations (per SWPPP), and Corrective Actions

Maintenance Requirements and BMP Installations per SWPPP:

- Per CGP sections 2.1.1.4 and 2.3.2, ensure that all erosion and sediment controls and pollution prevention controls remain in effective operating condition during permit coverage.
- If inspection reveals maintenance is required on erosion and sediment controls or pollution prevention controls, if the problem does not require significant repair or replacement, or can be corrected through routine maintenance, you must initiate work to fix the problem immediately after discovering the problem and complete the work by the close of the next work day. Examples include removing accumulated silt from behind a silt fence or check dam, or re-staking fiber wattles that are dislodged, basic site clean-up or housekeeping issues, etc.
- When installation of a new erosion or sediment control or pollution prevention control is needed, or a control requires significant repair, a new or modified control must be installed and operational by no later than 7 calendar days from the day of discovery. In the *Action Taken* or *Action Required* boxes of the tables in 2802 Section 6, indicate if the control is being installed per the SWPPP document or if it is a new, additional, or modified control not listed in the original SWPPP.
- If it is a new, additional, or significantly modified control not listed in the original SWPPP, it qualifies as a one of the Conditions Triggering Corrective Action Report, and additional documentation requirements apply per CGP section 5.4.1 and 5.4.2.
- Once any new control listed in ITD 2802 Section 6 has been installed, it should be listed in the Installed Controls (BMPs) table of ITD 2802 Section 5 of the following inspection report.
- There are instances where correcting BMP Deficiencies within 7 days could cause harm to water quality. An example is that site conditions are so wet that getting the equipment onto the project site to address the deficiencies could result in off-site discharge, therefore, the deficiency cannot be addressed until conditions dry out. In a case like this, thorough documentation of site conditions and weather conditions preventing the item from being corrected and completed is required.
- In the first box of ITD 2802, Section 6, provide information regarding actions taken/completed since the last inspection. This includes maintenance and installation actions identified on the previous inspection report that are carried over to document their completion, or actions identified since the last inspection was completed that have already been completed because completion was required by the day after they were identified (i.e. between inspections).
- In the second box, provide information regarding maintenance and installation actions identified during the current inspection that require completion, or items that were not satisfactorily completed from the previous inspection. This could also include new installation of BMPs that are already part of the SWPPP plan, but have not been installed yet due to project phasing or build-out.

- When describing maintenance or installation actions, include item number and inspection number (item 1 on inspection 20 would be shown as 20-1, item 2 would be shown as 20-2, etc.), the BMP location(s), action taken or required, and the date completed or required to be completed based on the type of action.
- Per CGP section 4.1.6.5, identify in the box provided any and all actual or potential incidents of CGP noncompliance observed.

Conditions Triggering Corrective Action Report(s):

- In the 2012 CGP section 5.2.1, there are 3 conditions which would trigger the completion of a Corrective Action Report(s). This is an additional layer of documentation in the SWPPP on top of the inspection and the SWPPP modification/amendments. The three check box options represent the conditions that would require the completion of a Corrective Action Report(s).
- Checkbox one represents the installation of BMPs that are not part of the original project plans or SWPPP, or a significant change in installation becomes required that is not part of the SWPPP. Based on observations made during the inspection, indicate where additional BMP(s) or modifications are required to ensure permit compliance. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP; and upon installation, enter the new BMP into ITD 2802, Section 5 of the subsequent inspection. You will also need to add an entry into the SWPPP modification log within 7 days, and have both entries certified using the appropriate certification sheet in the SWPPP appendices.
- Checkbox two represents a situation where a BMP failed to operate as designed, proved inadequate, or wasn't installed properly resulting in discharges of sediment or other pollutants from the site that violated Idaho water quality standards. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP; and upon installation, enter the new BMP(s) into ITD 2802, Section 5 of the subsequent inspection. You will also need to add an entry into the SWPPP modification log within 7 days, and have both entries certified using the appropriate certification sheet in the SWPPP appendices. You should also have filled in discharge information in the appropriate part of ITD 2802, Section 5 as described above, including completion of form ITD 2790 with submittal to the HQ ENV SWPPP mailbox. A discharge that violates Idaho water quality standards must be reported to EPA verbally within 24 hours and in writing within 5 days per 2012 CGP Appendix I.12.6. See the non-compliance reporting process at the end of these instructions for more details.
- Checkbox three represents a situation where a prohibited discharge (toxic or hazardous material) per CGP section 2.3.1 has occurred. If this box is checked, you will need to make 24-hour and 7-day entries into the Corrective Action Reporting Tables in the project SWPPP, and if BMP installation is required, enter the new BMP (s) into ITD 2802, Section 5 of the subsequent inspection. You may also need to add an entry into the SWPPP modification log, and have both entries certified using the appropriate certification sheet in the SWPPP appendices. You should also have filled in details of the discharge in the appropriate part of ITD 2802, Section 5 as described above, including completion of form ITD 2790 with submittal to the HQ ENV SWPPP mailbox. A toxic or hazardous material discharge must be reported to EPA verbally within 24 hours and in writing within 5 days per 2012 CGP Appendix I.12.6. See the non-compliance reporting process at the end of these instructions for more details.
- All Corrective Action Reports and SWPPP modifications must be signed and certified by the same ITD and Prime Contractor authorized representatives who signed the original SWPPP, or their duly authorized representatives per 2012 CGP Appendix I.11. That authorization must be made using the appropriate Delegation of Authority sheet in the SWPPP appendices. The revisions are also required to be made on plan sheets (similar to "as constructed" drawings). Refer to CGP section 7.4 for all instances requiring SWPPP modifications.

Summary of Inspection Findings:

- Use the checkboxes to summarize the overall findings of the inspection. One of the top three boxes will be checked on every inspection, but often an additional box will be checked. One or more of the fourth-sixth boxes are checked in addition to one of the top three if you note new maintenance or installation requirements, or corrective action requirements during the current inspection.
- First box would be checked if no maintenance items were noted in Section 6 of the previous ITD 2802.
- Second box would be checked if maintenance items noted in Section 6 of the previous ITD 2802 have all been completed, and no further action is required on those items. Those items should be identified in the first table of Section 6 of the current ITD 2802 as actions taken with the date completed.
- Third box would be checked if maintenance items identified in Section 6 of the previous ITD 2802 have not all been completed, not completed satisfactorily, or require additional or further action. They should be identified in the second table of Section 6 of the current ITD 2802 documenting that additional action is required. This scenario may indicate CGP noncompliance since CGP sections 2.1.1.4 and 2.3.2 specify maintenance completion timelines. If CGP noncompliance exists, provide that information in the last table (box) of Section 6 of the current ITD 2802.

- Fourth box would be checked in addition to one of the previous three if new maintenance requirements have been identified during the current inspection, and these would be noted in the second table of Section 6 of the current ITD 2802.
- Fifth box would be checked in addition to one of the previous four if new installation requirements per the initial SWPPP have been identified during the current inspection, and these would be noted in the second table of Section 6 of the current ITD 2802.
- Sixth box would be checked if one of the three boxes under the *Conditions Triggering Corrective Action Report* in Section 6 of the current ITD 2802 has been checked. If this is checked because of a discharge (second and third boxes), there should also be discharge information entered into the *Discharges Entering Waters of the US* tables of Section 5 of the current ITD 2802.
- Seventh box would be checked if the sixth box was checked, and discharge information is entered into the *Discharges Entering Waters of the US* tables of Section 5 of the current ITD 2802. This box would also be checked and an ITD 2790 submitted if the conditions identified as "Upset" in CGP Appendix I, section I.14 have occurred.

Section 7 – Other Outstanding Items

- Document any outstanding issues or project information, or any other issues determined not to be related to BMP maintenance, installation, or Corrective Action here.
- Document any special permitting information, special operating conditions, etc. This could include Army Corps of Engineers permitting information, IDWR stream alteration permitting information, CGP turbidity monitoring requirements, project scheduling driven by a BA or BO, etc.

Section 8 – Inspection Certification

- Within 24 hours of each completed inspection, the Primary inspector shall sign and date the inspection to certify completion and inspection findings, and the Primary Inspector or the WPCM shall make the Prime Contractor aware of the inspection findings.
- The WPCM is strongly encouraged to conduct joint inspections with the Primary inspector whenever possible. The WPCM is required to document their site inspections(s) and may do so by signing the ITD inspection report as documentation that he/she participated in a joint inspection with the Primary inspector. When signing, include the most recent WPCM training qualification date and unique qualification number.
- If a joint inspection is not feasible, the WPCM must complete an independent inspection using ITD 2802 to document their inspections per Contract requirements. ITD does not sign any independent WPCM inspections. If the WPCM performs independent inspections, it is not recommended that the inspections be included as formal SWPPP recordkeeping inspections, as this could create discrepancies with maintenance/installation requirements and corrective action tracking and completion records. However, they should be inserted into the SWPPP as an appendix. If requested, these independent inspections must be made available to the Engineer.
- The Prime Contractor must check the box that represents his/her interpretation of the inspection findings. Either agrees with findings, or disagrees with findings. If disagrees, the Prime Contractor must specify the reason for disagreement in the box provided. Sign and certify the form per CGP requirements. The Prime Contractor's signature must be that of the individual who certified the SWPPP and/or NOI, or their duly authorized representative. Refusal to sign the form could result in a breach of contract as well as CGP noncompliance.
- Any delegation of signature authority to someone other than the signer of the initial SWPPP must be documented in the SWPPP.
- The ITD District Engineer, or ITD District Engineering Manager as their Duly Authorized Representative, must sign and date the inspection. Any delegation of signature authority must be documented in the project SWPPP.

ITD 2802, Corrective Action Reporting, and SWPPP Modification Submittal and Distribution Process

- Records of inspection, corrective action, or SWPPP modification completion can be accomplished by inserting a copy of the unsigned/uncertified documentation in the SWPPP as a placeholder until the certified copy is routed back to the SWPPP. This documents completion of any maintenance, installation, or corrective action requirements, and can be referenced while the physical document is routed for signature/certification. This record provides documentation that the work was completed as required, while the original document is routed for required signatures and certifications.
- Upon completion, and once signed by the Primary Inspector and WPCM, the ITD 2802 is distributed to the District Engineer and Prime Contractor, or their duly authorized representatives, for signature and certification.

- Upon completion of any corrective action reporting and/or SWPPP modifications, the signature and certification sheet describing actions taken is distributed to the District Engineer and Prime Contractor, or their duly authorized representatives, for signature and certification.
- The signed and certified ITD 2802 and any corrective action and/or SWPPP modification signature and certification sheet should be placed back into the SWPPP recordkeeping section within approximately 2 weeks of completion, per EPA recommendations.
- Upon completion of all signatory and certification requirements, the completed ITD 2802 is distributed to the District Engineer, District Engineering Manager, Resident Engineer, District Senior Environmental Planner, Headquarters Environmental via the HQ ENV SWPPP Inbox, and the Prime Contractor.
- Hard copies of all original, signed and certified ITD 2802s and other SWPPP records are archived by project by the Districts and retained for three years from the date the permit expires or is terminated.

Non-Compliance Reporting Process

- Per CGP sections 5.2.1.2 and I.12, noncompliance issues which endanger health or the environment must be reported to EPA verbally within 24 hours and in writing within 5 days of discovery. Any violation of Idaho water quality standards or prohibited discharge per CGP section 2.3.1 is considered to endanger health or the environment. District staff must report any instances of noncompliance to the Headquarters Environmental as soon as any issue is discovered so that it can be reported to EPA verbally.
- District staff must not report noncompliance directly to EPA. All communications with EPA must be completed through Headquarters Environmental or ITD's Legal Department Attorney General representative.
- Noncompliance issues must be reported through the HQ ENV SWPPP e-mail inbox using ITD 2790 as soon as identified. Provide all required information on the ITD 2790 to capture the noncompliance issue being reported. Follow the directions on that form.
- If there is uncertainty as to whether or not an issue of noncompliance exists, it is best to be cautious and report any issues that could be deemed non-compliant. Headquarters Environmental and ITD Legal can determine if the issue represents reportable noncompliance to EPA.